

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

**WITNESS/EXHIBIT LIST**

**Jury Trial  
before Judge Michael H. Watson  
beginning**

**January 19, 2005 and ending January 26, 2005**

Ali Bahar,

Plaintiff,

v.

Case No. 1:01cv798  
(Watson, J.)

City of Cincinnati,

Defendant.

Caption						Docket Number
Ali Bahar v. City of Cincinnati						1:01cv798
Plaintiff's Attorney			Defendant's Attorney			Trial Day(s)
Kelly Myers Randy Freking			Gus Giglio Terry Nestor			1/19-20 - 31 - 34 - 25
Presiding Judge		Courtroom Deputy		Court Reporter Name & Date(s)		Description of Exhibits or Witnesses
Michael H. Watson		Barbara Crum		Julie Wolfer, (Official)		
Pf. #	Def.#	Date Shown	Offered	Admitted	Witness/Attorney	
PX1		1/19/05			Johnson/Freking	Application for Employment/Promotion
PX2-1		1/19/05	X	X	Johnson/Freking	City of Cincinnati Performance Report (2-1)
PX2-2		1/19/05	X	X	Johnson/Freking	" " " "
PX2-3		1/19/05	X	X	Johnson/Freking	" " " "
PX2-4		1/19/05	X	X	Johnson/Freking	" " " "
PX2-5		1/19/05	X	X	Johnson/Freking	" " " "
PX2-6		1/19/05	X	X	Johnson/Freking	" " " "
PX2-7		1/19/05	X	X	Johnson/Freking	" " " "
PX2-8		1/19/05	X	X	Johnson/Freking	" " " "
PX2-9		1/19/05	X	X	Johnson/Freking	" " " "
PX2-10		1/19/05	X	X	Johnson/Freking	" " " " 1998
		1/19/05	X	X	Johnson/Freking	1999
PX3		1/19/05			Johnson /Freking	Commendation Letters
PX6		1/19/05			Johnson /Freking	email response from Chapman to Bahar
PX7		1/20/05	X	X	Johnson /Freking	memo from Johnson to Sr. Engineering Technician
DX 2023		1/20/05	X	X	Johnson/Freking /Nestor	1/12/99 Memo re: MSD Policy
DX 2022		1/20/05			Johnson /Nestor	8/18/00 Memo to CSC from J. Johnson
DX 2022		1/20/05	X	X	Johnson /Nestor	6/5/00 Memo re: Employees Working Out of Classification
DX 2023		1/20/05	X	X	Johnson /Nestor	2/7/02 Email from Johnson to Bahar + Campbell
DX 2023		1/20/05	X	X	Johnson /Nestor	Promotion List 1/1/00 to 7/1/02 (a,b)
PX14		1/20/05	X	X	Johnson /Nestor	Job Summary
DX 2003		1/20/05	X	X	Johnson / Freking	EIT Classification Specifications
		1/20/05			Niehaus / Freking	Niehaus Depo (Pg 49, Ln 4)/(Pg 53, Ln 16)
PX5		1/20/05	X	X	Huang / Myers	City of Cincinnati Notice of Official Pretrial
DX 2022		1/20/05	X	X	Huang / Giglio	6/5/00 Memo re: Employees Working Out of Classification
DX 2023		1/20/05	X	X	Huang / Giglio	1/12/99 Memo re: MSD Policy
DX 2012		1/20/05			Huang / Giglio	Pretrial of Bahar, 7/10/00

Caption

Pf#	Def.#	Date Shown	Offer ed	Admitted	Witness/Attorney	Description of Exhibits or Witnesses
	DX 2073	1/20/05	X	X	Huang/Giglio	3/13/00 Huang Email to Campbell
	DX 2089	1/20/05	X	X	Huang/Giglio	Staff Allocation for USEPA Response
PX 2		1/20/05			Banar/Myers	City of Cincinnati Performance Reports
PX 4		1/20/05	X		Banar/Myers	Handwritten calendar notes from 8/13/99
PX 5		1/20/05			Banar/Myers	City of Cincinnati Notice of Official Reprimand
PX 6		1/20/05	X	X	Banar/Myers	7/25/00 Email response from Chapman to Banar
PX 11-2		1/31/05	X	X	Banar/Myers	1/31/02 Letter from Banar to Minges
PX 11-1		1/31/05	X	X	Banar/Myers	1/31/02 Letter from Bahar to Minges
DX 2036		1/21/05	X	X	Banar/Giglio	4/23/01 Banar Email
DX 2018		1/21/05	X	X	Banar/Giglio	8/24/00 Banar Email
PX 2005		1/21/05	X	X	Banar/Giglio	CSC Minutes re: Banar Appeal
DX 2016		1/21/05	X	X	Banar/Giglio	8/16/00 Bahar Letter to Deesie
DX 2017		1/21/05	X	X	Bahar/Giglio	8/18/00 Bahar Emails
DX 2092		1/21/05	X	X	Bahar/Giglio	EEO Processing Form
PX 10		1/21/05	X	X	Bahar/Giglio	Bahar 3/9/01 EEOC Charge (Pg 1)
DX 2051		1/21/05	X	X	Bahar/Giglio	Bahar EEOC Complaint
DX 2053		1/21/05	X	X	Bahar/Giglio	Bahar EEOC Affidavit
DX 2047		1/21/05	X	X	Bahar/Giglio	Charge of Discrimination
DX 2054		1/21/05	X	X	Bahar/Giglio	Bahar EEOC Affidavit re: Retaliation
DX 2059		1/21/05	X	X	Bahar/Giglio	9/7/00 Bahar Email re: Leadership #3
DX 2055		1/21/05	X	X	Bahar/Giglio	3/22/01 Bahar Email
DX 2063		1/21/05	X	X	Bahar/Giglio	8/28/00 Chapman Email to Bahar
DX 2015		1/21/05	X	X	Bahar/Giglio	8/30/00 Chapman Memo
DX 2037		1/21/05	X	X	Bahar/Giglio	Updated Letter from Banar to Shirley
DX 2049		1/21/05	X	X	Bahar/Giglio	3/9/01 Minges Memo to Bahar, Kim, St. John
DX 2076		1/21/05	X	X	Bahar/Giglio	3/7/00 Karney Memo to Bahar
DX 2074		1/21/05	X	X	Campbell/Freking	4/10/00 Corr. R. Campbell to P. Karney
		1/21/05			Campbell/Freking	Campbell Depo (Pg 70, Ln 9)
DX 2013		1/21/05	X	X	Campbell/Freking	3/13/00 Huang Email to Campbell
DX 2002		1/21/05			Campbell/Freking	8/18/00 Memo to CSC from Johnson
		1/21/05			Campbell/Freking	Campbell Depo (Pg 47, Ln 3)
		1/21/05			Campbell/Freking	Campbell Depo (Pg 52, Ln 16)

### *Caption*

### Caption